

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

a. One (1) Gray iPhone, IMEI:
356942210820315,

b. One (1) White iPhone, IMEI:
352896111684457,

c. One (1) Gray iPhone S, IMEI:
356137099532509,

d. One (1) iCOM VHF Marine Transceiver,
Model: IC-M73, S/N: 41004266,

e. One (1) GPS Tracker Family1 APEX 4G,
IMEI: 352009117668728,

f. One (1) Black iPhone with a red cover,
IMEI: 354893099508863,

Defendants *in Rem*.

Civil No.:

VERIFIED COMPLAINT FOR FORFEITURE IN REM

TO THE HONORABLE COURT:

COMES NOW, the United States of America brings this Verified Complaint for Forfeiture *In Rem* pursuant Supplemental Rule G(2) of the Federal Rules of Civil Procedure, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action *in rem* seeking forfeiture of the Defendants *in Rem* pursuant to:

21 U.S.C. §§ 881(a)(5) (all books, records, and research, including formulas microfilm, tapes, and data which are used, or intended for use, in violation of this subchapter); 881(a)(6) (all moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of this subchapter, all proceeds traceable to such an exchange, and all moneys, negotiable instruments, and securities used or intended to be used to facilitate any violation of this subchapter); 853(a)(2) (any of the person's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such violation); and 18 U.S.C. § 981(a)(1)(A) (any property, real or personal, involved in a transaction or attempted transaction in violation of section 1956, 1957 or 1960 of this title, or any property traceable to such property).

JURISDICTION AND VENUE

2. This Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345; over an action for forfeiture pursuant to 28 U.S.C. § 1355; and over this particular action pursuant to 21 USC §§ 881(a)(5), (a)(6), and 853(a)(2), and 18 U.S.C. § 981 (a)(1)(A).

3. Venue is proper in this district and the Court has *in rem* jurisdiction over the defendant *in rem* pursuant to 28 U.S.C. §§ 1355(b)(1)(A) and 1395(b) because the acts and omissions giving rise to the forfeiture occurred in this district.

DEFENDANTS IN REM

4. The Defendants *in Rem* are:

a. One (1) Gray iPhone, IMEI: 356942210820315,

- b. One (1) White iPhone, IMEI: 352896111684457,
- c. One (1) Gray iPhone S, IMEI: 356137099532509,
- d. One (1) iCOM VHF Marine Transceiver, Model: IC-M73, S/N: 41004266,
- e. One (1) GPS Tracker Family1 APEX 4G, IMEI: 352009117668728,
- f. One (1) Black iPhone with a red cover, IMEI: 354893099508863,

The Defendants *in rem* are within the possession, custody, or control of the United States. The Defendants *in rem* were seized on September 18, 2023, from Leandro Alberto Amadis-Eusebio at his residence in Fraidellanos Ward, Los Baez Sector, F Street #13, Guaynabo, Puerto Rico.

Facts Supporting Forfeiture

5. The Verified Complaint fully incorporates the facts contained in the attached Unsworn Declaration of Wilma Bonilla-Figueroa, a Special Agent for the Immigration and Customs Enforcement-Homeland Security Investigations (ICE-HSI).

Claim for Relief

6. The United States of America respectfully requests that the Court issue a warrant of arrest for the Defendants *in Rem*; that due notice be given to all parties to appear and show cause why the forfeiture should not be decreed; that the Court enter judgment declaring the Defendants *in Rem* condemned and forfeited to the United States of America for disposition according to law; and that the Court grant the United States of America such other and

further relief as the Court may deem just and proper, together with the costs and disbursements of this action.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of March 2024.

W. STEPHEN MULDROW
United States Attorney

/s/ Myriam Y. Fernández-González
Myriam Y. Fernández-González
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VERIFIED DECLARATION

I, Myriam Y. Fernández-González, Assistant United States Attorney, declare pursuant penalty of perjury as provided by 28 U.S.C. § 1746, the following:

That the foregoing Complaint is based on reports and information furnished to me by the Immigration and Customs Enforcement-Homeland Security Investigations (ICE-HSI); that everything contained therein is true and correct to the best of my knowledge and belief.

Executed in San Juan, Puerto Rico, this 12th day of March 2024.

s/ Myriam Y. Fernandez-Gonzalez
Myriam Y. Fernández-González
Assistant United States Attorney

VERIFICATION

I, Wilma Bonilla-Figueroa, depose and say that I am a special agent with the Immigration and Customs Enforcement-Homeland Security Investigations (ICE-HSI). and as such have responsibility for the within action, that I have read the contents of the foregoing Verified Complaint for Forfeiture *in Rem* and, pursuant to 28 U.S.C. § 1746, verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed in San Juan, Puerto Rico, this 12th day of March, 2024.

Wilma Bonilla-Figueroa
HSI Special Agent